

REMARKS

Claims 1-5, 7-21, and 23-35 remain pending. Independent claims 1 and 14 have been amended. Claim 7 has been rewritten in independent form. The rejection is respectfully traversed.

With respect to independent claims 1 and 14, the claims have been amended to indicate that the print content is from a content provider location.¹ Preferred embodiments of the invention provide a generalized print service to facilitate the printing by reference of content of content providers. For example, "A likely scenario involves the portable wireless device 16 accessing a content provider 18, typically a web site over the Internet. The web site might include a link to print content, such as a "print-this" link. If selected, the print by reference target is transmitted to the portable wireless device 16, which then can commence a print by reference operation with the print device 10." P5, L8-13. This is unlike the system of Eldridge or the other token-based document servers upon which Eldridge is based and that are discussed in C1, L20-35 of Eldridge.

Eldridge is directed to a token-based document server that includes print-by-reference operations where users can print-by-reference their own documents by providing a document token. "Each portable device emulates its user's personal satchel for documents: the device is programmed to receive transmit and store document references (World Wide Web URLs), each of which is associated with an electronic document stored in an electronic repository at a site on the web." C1, L25-30. The tokens include information to associate a document with a user, which is the owner of the document: "the token having a plurality of token components, each token component defining a document related entity and a property of the entity" C3, L25-30. The documents may be stored on an intranet or the internet (C7, L41-50; see also, C12, L50-52 "file server 52 (which may be in a different building or in a

¹ It is noted that claim 22 including the requirement that the addressed URL address a content provider. However, this feature was not accounted for in the rejection of claim 22, as the feature was nowhere discussed on page 9 of the office action.

different country), although it will be appreciated that the document could be stored locally on the workstation 50”), but the mobile device initiating a print-by-reference operation requires that the device first be provided the document tokens by having created it, or possible, by receiving it via e-mail or other means. C11, L56 – C12, L55.

Eldridge’s system and methods do not disclose or suggest the invention of claims 1 and 14. In amended claim 1, the reference to print content is to print content of a content provider that is separate from the print service, instead of a user’s documents that are associated with a token on a token server. The purpose of Eldridge’s system and the manner of realization is quite different from the system now more clearly defined in claim 1. Eldridge has limited application and is concerned only with providing access to a user’s documents, whether they may have been previously created or received by e-mail or otherwise. Eldridge does not provide a solution for printing by reference content of a content provider with use of a web based or local print service. The invention as defined in claims 1 and 14, on the other hand provide print server solutions for printing by reference of generalized content and the user need not have previously received a secure token to be able to conduct the print by reference operation.

Claim 7 has been rewritten in independent form. This claim was rejected based upon one of a number of combinations of references, namely, Eldridge, Petteruti, W3C & Gase. The rejection is traversed.

First, the combination is unsupported. It is noted that the rejection of the claims as originally stated included 13 separate theories of obviousness based upon a multitude of combinations. With regard to claim 7, the stated basis for the combination is that “it allows for data transfer over the World Wide Web and it would complement the use of SOAP.” This fails to find support in the references, for a number of reasons. One reason is that Eldridge already has document access over the WWW, as indicated in C8, L1-10. An artisan would not be motivated to look to the three additional references for providing WWW access, therefore. Another reason is that none

of the second, third, or fourth reference concern print by reference operations. The combination (especially when considered with the large number of other combinations applied) indicates that the claim 7 was used as a roadmap for constructing the rejection. Yet another reason is that the token based servers used by Eldridge define an independent protocol, and it is not clear how the additional references suggest modification of a token based protocol.

Claim 7 provides a server of a preferred embodiment that makes a particular use of an argument resolution protocol. Separate control and data communications are used, and are unaccounted for in the statement of the rejection. Regarding claim 8, a specific invention for leveraging existing SOAP for printing by reference support is provided. There is not any suggestion in the applied references of leveraging an argument resolution protocol, and certainly not SOAP, for printing by reference. The claims provide a specific solution that leverages existing protocols (instead of creating a unique token resolution protocol) for providing printing by reference.

For all of the above reasons, reconsideration and allowance of the application is requested. The examiner is invited to contact the undersigned attorney at the below listed number if the examiner has any questions concerning this amendment.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

By



Steven P. Fallon

Registration No. 35,132

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300 South Wacker Drive, Suite 2500
Chicago, Illinois 60606
(312) 360-0080
Customer No. 24978